

Exhibit 2

From: SALEM, Sara <Sara.Salem@freshfields.com>
Sent: Friday, April 26, 2024 8:02 PM
To: Geraldine W. Young; GARRETT, Tyler; dpearl@axinn.com; Audrey Moore; jhunsberger@axinn.com; SESSIONS, Justina (JKS); Bradley Justus; Paul Yetter; Bracewell, Mollie; MAHR, Eric (EJM); MCCALLUM, Robert; ELMER, Julie (JSE); Daniel Bitton; Ali Vissichelli; Bryce Callahan; EWALT, Andrew (AJE); VACA, Lauren
Cc: Zeke DeRose III; Jonathan.Wilkerson; Alex J. Brown; Marc B. Collier; John McBride; Peter M. Hillegas; Trevor.Young; Noah Heinz; Zina Bash; Joseph M. Graham Jr.; Ashley Keller; Brooke Smith; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez; NRFAAdTech; James R. Hall; Melonie DeRose; LARITZ, Tina; BOSCO, Veronica
Subject: RE: State of Texas v Google - Deposition Notices

Counsel –

[REDACTED] is available for a deposition on the noticed date, Friday May 3, 2024 at 9am ET either remotely or in person in Atlanta, Georgia. Please let us know whether Plaintiffs intend to proceed remotely or in person.

[REDACTED] is available for a deposition on the noticed date, Friday May 3, 2024 at 9am ET either remotely or in person in New York. Please let us know whether Plaintiffs intend to proceed remotely or in person.

As noted in our April 22, 2024 letter, Google's counsel does not represent [REDACTED] and we cannot accept service of a deposition notice or subpoena. Ms. [REDACTED]'s last known address is 520 8th St, Brooklyn, NY 11215.

Best,
Sara

Sara Salem
Senior Associate
T +1 202 777 4529 | M +1 202 853 0381

From: SALEM, Sara
Sent: Thursday, April 25, 2024 9:32 PM
To: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; dpearl@axinn.com; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmel@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.VACA@freshfields.com>
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Subject: RE: State of Texas v Google - Deposition Notices

Counsel –

[REDACTED] will be available for a deposition next Thursday, May 2 at 10am PT either remotely or in person in Los Angeles, California. Please let us know whether Plaintiffs intend to proceed remotely or in person.

Thanks,
Sara

Sara Salem

Senior Associate

T +1 202 777 4529 | M +1 202 853 0381

From: SALEM, Sara

Sent: Thursday, April 25, 2024 2:12 PM

To: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; dpearl@axinn.com; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.VACA@freshfields.com>

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Subject: RE: State of Texas v Google - Deposition Notices

Yes, Mr. [REDACTED]'s May 2 start time should be **9am ET** (not PT) and we understand that Plaintiffs and the court reporter/videographer will be remote. Thank you for confirming.

Sara Salem

Senior Associate

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From: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>

Sent: Thursday, April 25, 2024 1:46 PM

To: SALEM, Sara <Sara.Salem@freshfields.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; dpearl@axinn.com; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>

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Trevor.Young <Trevor.Young@oag.texas.gov>; Noah Heinz <[Noah.Heinz@kellerpostman.com](mailto>Noah.Heinz@kellerpostman.com)>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; NRFAAdTech <NRFAdTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; LARITZ, Tina <Tina.LaRitz@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

Thank you for confirming, we will start with Ms. [REDACTED] at 10 am ET (not 9 am ET).

We had a question too regarding Mr. [REDACTED]'s start time on 5/2/2024 – you all had listed him as starting at 9 am PT. Should that be 9 am ET, given he is in NY?

From: SALEM, Sara <Sara.Salem@freshfields.com>
Sent: Thursday, April 25, 2024 12:10 PM
To: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; dpearl@axinn.com; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>
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Subject: RE: State of Texas v Google - Deposition Notices

Hi Geraldine –

Thank you for the confirmation on Mr. [REDACTED].

With respect to Ms. [REDACTED], Google has completed its production of Ms. [REDACTED]'s custodial documents. Ms. [REDACTED] is available to start at your requested 10am ET start time (not 9am) for up to seven hours on the record.

Best,
Sara

Sara Salem
Senior Associate
T +1 202 777 4529 | M +1 202 853 0381

From: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>
Sent: Thursday, April 25, 2024 12:12 PM
To: GARRETT, Tyler <Tyler.Garrett@freshfields.com>; dpearl@axinn.com; SALEM, Sara <Sara.Salem@freshfields.com>; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>;

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Subject: RE: State of Texas v Google - Deposition Notices

We plan to proceed in person with Mr. [REDACTED]'s deposition and with exhibit share, so please ensure he has access to a laptop and wifi.

Regarding Ms. [REDACTED]'s deposition scheduled for tomorrow, we have cleared our conflict and can start at her preferred time of 9 am ET. We, however, have not received confirmation from you on the following requested yesterday: We also request that you confirm that Google has completed its production of custodial documents and all related metadata for Ms. [REDACTED] (as well as for all upcoming scheduled depositions including Mr. [REDACTED]). Please also confirm we will be able to depose Ms. [REDACTED] for up to 7 hours on the record. If you can send us those confirmations, we will forward link today when we get it.

Thanks, Geraldine

From: GARRETT, Tyler <Tyler.Garrett@freshfields.com>
Sent: Thursday, April 25, 2024 10:13 AM
To: dpearl@axinn.com; Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; SALEM, Sara <Sara.Salem@freshfields.com>; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>
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Subject: RE: State of Texas v Google - Deposition Notices

Hi Geraldine,

Can you please confirm whether Plaintiffs intend to proceed remotely or in-person (Freshfields' Redwood City office, 855 Main St, Redwood City, CA 94063) for [REDACTED]'s deposition on May 1 beginning at 9am PT?

Best,
Tyler

From: Pearl, David <dpearl@axinn.com>
Sent: Wednesday, April 24, 2024 8:26 PM
To: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; SALEM, Sara <Sara.Salem@freshfields.com>;
Audrey Moore <Audrey.Moore@LanierLawFirm.com>; jhunsberger@axinn.com; SESSIONS, Justina (JKS)
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<Melonie.DeRose@LanierLawFirm.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; LARITZ, Tina
<Tina.LaRitz@freshfields.com>
Subject: RE: State of Texas v Google - Deposition Notices

All,

[REDACTED] will be available for a deposition next Wednesday, May 1, at 9 AM ET, either remotely or in person in New York. If you would like to take his deposition in person, we will follow up with the exact location.

Thanks,

David

David Pearl
Partner



Axinn, Veltrop & Harkrider LLP
1901 L Street NW
Washington, DC 20036
Office 202.469.3514
Mobile 310.733.8444
dpearl@axinn.com
Axinn.com

55 Second Street
San Francisco, CA 94105

Pronouns | He, Him, His

From: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>
Sent: Wednesday, April 24, 2024 4:46 PM
To: SALEM, Sara <Sara.Salem@freshfields.com>; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; Pearl, David <dpearl@axinn.com>; Hunsberger, James K. <jhunsberger@axinn.com>; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Justus, Bradley <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Bitton, Daniel S. <dbitton@axinn.com>; Vissichelli, Allison M. <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>
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Subject: RE: State of Texas v Google - Deposition Notices

Caution: External Email

Caution: External Email

Counsel:

You have provided us less than 48 hours' notice of Ms. [REDACTED]'s deposition. We request that for any future depositions that we be provided at least 3 days' notice. As you know, there are still a number of 30(b)(1) and 30(b)(6) depositions and topics that have not been scheduled.

We also request that you confirm that Google has completed its production of custodial documents and all related metadata for Ms. [REDACTED] (as well as for all upcoming scheduled depositions including Mr. [REDACTED]).

If that is the case, we will take Ms. [REDACTED]'s deposition remotely on Friday April 26 but request a slightly later start time at 10 am ET (which is still less than 48 hours from your email below), due to pre-existing conflicts on our end. Please confirm that start time will work and we will be able to depose Ms. [REDACTED] for up to 7 hours on the record, and we will make the arrangements and send you all the zoom link for the deposition.

Thank you,
Geraldine

From: SALEM, Sara <Sara.Salem@freshfields.com>
Sent: Wednesday, April 24, 2024 11:46 AM
To: Audrey Moore <Audrey.Moore@LanierLawFirm.com>; dpearl@axinn.com; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>

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Subject: RE: State of Texas v Google - Deposition Notices

[External Email – Use Caution]

Counsel –

██████████ is available for a deposition on April 26, 2024 beginning at 9am ET remotely or at Freshfields New York office.

Best,
Sara

Sara Salem

Senior Associate

T +1 202 777 4529 | M +1 202 853 0381

From: SALEM, Sara

Sent: Monday, April 22, 2024 1:31 PM

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Cc: Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor Young <Trevor.Young@oag.texas.gov>; Noah Heinz <[Noah.Heinz@kellerpostman.com](mailto>Noah.Heinz@kellerpostman.com)>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; NRFAAdTech <NRFAAdTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

Counsel –

I write with an update on [REDACTED]'s availability. Mr. [REDACTED] is available for a deposition on May 1, 2024 beginning at 9am PT remotely or at Freshfields Redwood City office.

Best,
Sara

Sara Salem

Senior Associate

T +1 202 777 4529 | M +1 202 853 0381

From: Audrey Moore <Audrey.Moore@LanierLawFirm.com>

Sent: Wednesday, April 17, 2024 8:16 PM

To: dpearl@axinn.com; jhunsberger@axinn.com; SALEM, Sara <Sara.Salem@freshfields.com>; SESSIONS, Justina (JK) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>
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Subject: RE: State of Texas v Google - Deposition Notices

Counsel,

The Plaintiff States hereby serve the attached Notices of Deposition for the following deponents in the *State of Texas et al. v. Google LLC* case, No. 4:20-cv-00957-SDJ:

- A horizontal bar chart illustrating the percentage of children aged 0-17 years with mental health conditions. The y-axis lists ten categories, each preceded by a black dot. The x-axis represents the percentage, ranging from 0% to over 50%. The bars show varying percentages for each category.

Category	Percentage (%)
•	~48
•	~45
•	~42
•	~38
•	~35
•	~32
•	~28
•	~25
•	~22
•	~18

Thank you.

Audrey



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